

*Law Offices of
Susan G. Kellman
Attorney at Law
25 Eighth Avenue
Brooklyn, New York 11217*

Telephone: (718) 783-8200

Telefax: (718) 783-8226

e-mail: kellmanesg@aol.com

*Fellow, American College
Of Trial Lawyers*

January 19, 2012

**By Facsimile: (718) 616-2386
and ECF and Regular Mail**

Hon. Allyn R. Ross
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: U.S. v. Larry Carr
11 Cr. 454 (ARR)

Dear Judge Ross:

Counsel writes to respectfully request a further modification of Mr. Carr's bail conditions which would permit him to work in Florida during the month of February. Mr. Carr has provided counsel with copies of his contracts to work in two different cities in Florida, specifically, Lake Wales and Venice, during this month. As Your Honor knows, Mr. Carr is about to undergo a psycho-neurological evaluation, and counsel is doing everything possible to expedite the evaluation, recognizing that the completion of such an evaluation is critical to the progress of this case. We will be careful not to allow Mr. Carr's travel to interfere with the progress of Dr. Yates' evaluation.

I have discussed Mr. Carr's travel request with PTS Officer Erin Rodriguez and AUSA Lan Nguyen and neither has an objection. I have told Mr. Carr that should Your Honor grant his request to travel, he would continue to be required to keep in telephone contact with PTS Officer Rodriguez during this period of time. Officer Rodriguez has confirmed that Mr. Carr has been compliant with his conditions of release and has kept in regular contact with PTS.

Accordingly, counsel respectfully requests that Your Honor modify Mr. Carr's bail conditions to permit him to travel from his home in Georgia, to Florida on February 1, 2012, returning on March 1, 2012.

The Court's attention to this matter is greatly appreciated.

Respectfully submitted,

Susan G. Kellman

Susan G. Kellman

cc: Lan Nguyen, Esq.
Asst. United States Atty.

Erin Rodriguez, PTS

Larry Carr